

May 7, 2018

**BY ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Re: Connect America Fund, WC Docket No. 10-90;  
Connect America Phase II Challenge Process, WC Docket No. 14-93 –  
Alaska Communications Locations In Partially-Served Census Blocks –  
Notice of *Ex Parte* Communication

Dear Ms. Dortch:

On Thursday, May 3, 2018, I met on behalf of Alaska Communications Systems Group, Inc. (“Alaska Communications”), with Jay Schwarz of the office of Chairman Pai, Amy Bender of Commissioner O’Rielly’s office, and Alex Minard and Talmage Cox of the Wireline Competition Bureau, concerning the above-captioned matter. Leonard Steinberg, Ruth Willard and Shawna Brandau, all of Alaska Communications, participated in these meetings by teleconference. On Monday, May 7, Mr. Steinberg of Alaska Communications and I met with Jamie Susskind of Commissioner Carr’s office concerning the same, and Ruth Willard of Alaska Communications participated by teleconference.

On December 28, 2017, Alaska Communications filed in WC Docket No. 14-93 the required geocoded information for 6,056 customer locations (found at 4,762 unique sets of coordinates, as some locations are in multi-unit buildings) in 99 partially-served census blocks, intended as eligible locations under the requirements applicable to Connect America Fund (“CAF”) Phase II support.<sup>1</sup> In the meetings covered by this *ex parte* notice, Alaska Communications summarized the challenge filed by General Communication, Inc. (“GCI”) on March 22, and the reply filed by Alaska Communications on April 20, in the above-captioned dockets.

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<sup>1</sup> See Letter from Ruth L. Willard, Alaska Communications, to Marlene H. Dortch, FCC Secretary, in WC Docket Nos. 10-90, 14-93 (filed Jan. 3, 2018) (describing filing of geocoded location information with census block identifications in WC Docket No. 14-93 on Dec. 28, 2017). See generally *Connect America Fund*, WC Docket No. 10-90, Order, 31 FCC Rcd 12086 (2016) (*Alaska Communications CAF II Order*).

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In particular, Alaska Communications pointed out GCI's failure to provide reliable documentation of locations it actually serves, failure to document that GCI is an unsubsidized competitor in any of these locations, and inconsistencies between GCI's Form 477 coverage data and the maps it filed in its March 22 challenge. Therefore, Alaska Communications respectfully submits that the Commission must deny GCI's challenge and permit CAF Phase II support to be used in the locations proposed. Moreover, Alaska Communications intends to submit for the Bureau's consideration additional high-cost census blocks initially deemed "served" by the Bureau, which Alaska Communications now believes are either unserved or only partially served by GCI as a subsidized competitor.

Please direct any questions concerning this matter to me.

Respectfully submitted,

Karen Brinkmann

*Counsel to Alaska Communications*